

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:21cr42
)	
KEITH RODNEY MOORE,)	
Defendant)	

**CONSENT MOTION TO TEMPORARILY MODIFY RELEASE CONDITIONS TO
ALLOW MR. MOORE TO ATTEND FUNERAL AND BURIAL**

Keith Moore, through counsel, moves the Court to temporarily modify his current release conditions to allow Mr. Moore to attend the funeral and burial for his cousin who passed away late last week. In support of this motion, Mr. Moore states the following:

1. The government indicted Mr. Moore on May 4, 2021, for allegedly being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g), on December 5, 2020.
2. Mr. Moore made his initial appearance in this Court on this case on June 1, 2021, and was ordered released on conditions at his detention hearing on June 4, 2021. *See* ECF Nos. 8, 12. On September 7, 2021, the probation officer filed a petition to revoke Mr. Moore's release based on a then-pending misdemeanor charge in Richmond City General District Court that has since been dismissed. *See* ECF No. 37. On October 14, 2021, the Court dismissed that petition at the request of the government and again ordered Mr. Moore released on conditions. *See* ECF No. 57. Mr. Moore has remained on and complied with release conditions since that time.
3. Mr. Moore's release conditions include that he be on home detention with approval to leave his home (in coordination with the United States Probation Office) for "employment;

education; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervision officer” *See* ECF No. 12 at 2.

4. On December 2, 2021, one of Mr. Moore’s first cousins, N’aquan Fuller, died in Richmond, Virginia. The funeral services for Mr. Fuller are at Scott’s Funeral Home Chapel on 116 East Brookland Park Boulevard in Richmond, Virginia on Friday, December 10, 2021, at 1:30 p.m. Following the funeral, Mr. Fuller will be interred at Oakwood Cemetery in Richmond, Virginia. Mr. Moore and his mother, his third-party custodian, plan to attend the funeral and interment for Mr. Fuller if the Court grants this request.
5. Thus, Mr. Moore moves the Court to allow him to travel to the funeral beginning at 1:00 p.m. on Friday, December 10, 2021; to attend the funeral and interment; and to return to his regularly scheduled employment Friday evening, December 10, 2021, by 6:00 p.m. He will remain in the custody of his third-party custodian, his mother, during this temporary modification of the release conditions.
6. Undersigned counsel has communicated with Shea Gibbons and Erik Seibert, who represent the government in this case, about this request. Mr. Seibert has indicated that the government has no objection to this request. Undersigned counsel has also communicated with the United States Probation Office, represented here by Penelope Winsor, about this request. Ms. Winsor also has no objection to this request either.

Thus, Mr. Moore moves the Court to temporarily modify his current release conditions to allow Mr. Moore to attend the funeral and burial for his cousin who passed away late last week.

Respectfully submitted,
KEITH RODNEY MOORE

By: /s/

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